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Attorney for Ricky James Jr. Salas Santos

IN THE UNITED STATES DISTRICT COURT
FOR THE TERRITORY OF GUAM

UNITED STATES OF AMERICA,)	CR 20-00021
)	
Plaintiff,)	DEFENDANT'S WITNESS AND
)	EXHIBIT LIST FOR HEARING
vs.)	ON MOTION TO COMPEL
)	DISCOVERY
RICKY JAMES JR. SALAS SANTOS,)	
)	
Defendant.)	
_____)	

Pursuant to the order of this Court, Ricky hereby submits the following list of witnesses he intends to call at the hearing on his Motion to Compel Discovery, which is currently calendared for June 8, 2021, at 1:00 p.m.:

1. David Elliot, DEA Task Force Officer;
2. Henry James, DEA Task Force Officer;
3. Jan Dizon, DEA Task Force Officer;
4. Jeremiah Cruz, DEA Task Force Officer;

5. Jeremiah DeChavez, DEA Task Force Officer;
6. Shawn Ayuyu, DEA Task Force Officer;
7. Jason Correa, DEA Special Agent;
8. Willie Hayes, DEA Special Agent;
9. Erwin Fejeran, HSI Special Agent;
10. Ken Bowman, DEA Resident Agent in Charge.

Counsel anticipates the respective agents will testify about their roles in the investigation and surveillance of Ricky Santos, the sequence of events leading to his arrest, and his arrest. Counsel also anticipates they will testify about the policies and procedures in place for DEA agents and TFOs with respect to surveillance, note taking, report writing, and chain of custody. While undersigned does not have an estimate as to the length of each individual officer's testimony, it is estimated that the entire hearing will take several hours given the number of officers involved.

In addition, DEA TFO Henry James will be unable to provide testimony at the time presently set because of prior obligations and will need to be called at another time or at a continued hearing.

Also pursuant to Court order, Ricky submits the following items will be used as exhibits at the hearing:

1. Police Reports;
2. Amendments/Corrections to Police Reports;
3. Photographs of the scene;

4. Any items needed for rebuttal or impeachment.

DATED: Mongmong, Guam, August 3, 2020.

/s/



Briana E. Kottke
Assistant Federal Public Defender
District of Guam

Attorney for Defendant Ricky James Jr. Salas Santos